

Jennifer A. Golinveaux (SBN 203056)  
JGolinveaux@winston.com  
Bobby Li (SBN 342224)  
BLi@winston.com  
Winston & Strawn LLP  
101 California Street, 35th Floor  
San Francisco, CA 94111-5840  
Telephone: (415) 591-1000

Attorneys for Defendants  
Leonis Capital Partners, LLC and Jay Zhao

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL GRECCO  
PRODUCTIONS, INC., a California  
corporation,

Plaintiff,

vs.

LEONIS CAPITAL PARTNERS,  
LLC, a Delaware limited liability  
company; JAY ZHAO, an  
individual; and DOES 1-10,  
inclusive,

Defendants.

**Case No. 2:24-cv-7818 MRA (SSCx)**

**THIRD STIPULATION TO EXTEND  
TIME TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

[PROPOSED ORDER FILED  
CONCURRENTLY HEREWITH]

Complaint Served: September 20, 2024

Current Response Date: December 11, 2024

New Response Date: January 10, 2025

1 Plaintiff Michael Grecco Productions, Inc. (“Plaintiff”) and Defendants Leonis  
2 Capital Partners, LLC, Jay Zhao (collectively, “Defendants”) by and through their  
3 respective counsel and pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule  
4 8-3, hereby stipulate to the following:

5 1. Plaintiff filed its Complaint in the above-referenced on September 12,  
6 2024.

7 2. The Summons and Complaint in the above-referenced action were  
8 personally served on Defendants on September 20, 2024.

9 3. Defendants’ Response to the Complaint was originally due on October 11,  
10 2024.

11 4. On October 11, 2024, the Parties submitted to the Court a stipulation to  
12 extend Defendants’ time to respond to Plaintiff’s Complaint to November 11, 2024.

13 5. On November 11, 2024<sup>1</sup>, the Parties agreed and submitted for the approval  
14 of the Court a second stipulation to extend Defendants’ time to respond to Plaintiff’s  
15 Complaint to December 11, 2024 in the interest of allowing the Parties more time to  
16 engage in settlement discussions, which the Court granted.

17 6. The Parties continue to be actively engaged in settlement discussions. On  
18 December 6, 2024, the Parties agreed to stipulate to an addition extension of the  
19 deadline for Defendants to respond to Plaintiff’s Complaint by 30 days to January 10,  
20 2025, in order to allow the Parties sufficient time to reach a negotiated settlement.

21  
22 **THEREFORE**, pursuant to Local Rule 8-3, the Parties respectfully request that  
23 the Court extend Defendants’ time to respond to Plaintiff’s Complaint to January 10,  
24 2025.

25  
26 Dated: December 10, 2024

WINSTON & STRAWN LLP

27  
28 <sup>1</sup> The Second Stipulation was re-filed on November 13, 2024 to address a deficiency in  
the original November 11, 2024 filing.

1  
2 By: /s/ Jennifer A. Golinveaux  
3 Jennifer A. Golinveaux  
4 jgolinveaux@winston.com  
5 Bobby Li  
6 bli@winston.com

7 Attorneys for Defendants  
8 LEONIS CAPITAL PARTNERS, LLC  
9 and JAY ZHAO

10 ONE LLP

11 By: /s/ Peter R. Afrasiabi  
12 Peter R. Afrasiabi  
13 pafrasiabi@onellp.com  
14 Victoria E. Mulvey  
15 vmulvey@onellp.com

16 Attorneys for Plaintiff  
17 MICHAEL GRECCO PRODUCTIONS,  
18 INC.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ECF ATTESTATION**

I, Jennifer A. Golinveaux, attest the above listed signatories on whose behalf this document is being filed, have concurred in the context and have authorized the filing.

/s/ Jennifer A. Golinveaux

Jennifer A. Golinveaux